

**FILED**

APR 28 2021

Clerk, U.S. District Court  
District Of Montana  
Missoula

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**ATTORNEY FOR PLAINTIFF  
UNITED STATES OF AMERICA**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
MISSOULA DIVISION**

<b>UNITED STATES OF AMERICA,</b>	<b>CR 21- 20 -M- DWM</b>
<b>Plaintiff,</b>	<b>INDICTMENT</b>
<b>vs.</b>	<b>WIRE FRAUD (Counts I-X)</b> Title 18 U.S.C. § 1343 (Penalty: 20 years imprisonment, \$250,000 fine, and three years supervised release)
<b>CRAIG MARK DRAPER,</b>	<b>MONEY LAUNDERING (Counts XI-XII)</b> Title 18 U.S.C. §§ 1957, 2 (Penalty: Ten years imprisonment, \$250,000 fine (or twice the amount of the criminally derived property involved in the transaction), and three years supervised release)
<b>Defendant.</b>	

**THE GRAND JURY CHARGES:**

## WIRE FRAUD – COUNTS I-X

### THE SCHEME TO DEFRAUD

Beginning in approximately May 2017, and continuing until approximately October 2018, at Kalispell, in Flathead County, in the State and District of Montana, and elsewhere, including Wyoming, the defendant, CRAIG MARK DRAPER, executed a material scheme and artifice to defraud, and for obtaining money by means of material false and fraudulent pretenses, representations, promises, and omissions, and in doing so caused wire communications to be transmitted in interstate commerce.

To execute the material scheme and artifice to defraud, the defendant, CRAIG MARK DRAPER, operating as ADI Builders and other businesses, received money from customers in exchange for his promise to provide certain materials and perform certain work. Instead of providing the promised materials and performing the promised work, Draper used the money for unrelated business and personal expenses, including expenditures associated with leasing and operating a racetrack. To further execute the material scheme and artifice to defraud, Draper failed to pay vendors for construction materials and failed to fully compensate the employees engaged in the construction business.

## INTERSTATE WIRES

On or about the dates in the table below, the defendant, CRAIG MARK DRAPER, for the purpose of executing the aforementioned material scheme and artifice to defraud, and for obtaining money by means of material false and fraudulent pretenses, representations, promises, and omissions, did knowingly cause to be transmitted in interstate commerce wire communications, as outlined below, in violation of 18 U.S.C. § 1343.

Count	Date	Transaction	Amount
I	11/1/2017	Wire transfer to Draper's account at Whitefish Credit Union, ending in 8848	\$59,002
II	11/16/2017	Wire transfer to Draper's account at Whitefish Credit Union, ending in 8848	\$27,161
III	1/2/2018	Wire transfer to Draper's account at Whitefish Credit Union, ending in 8848	\$36,720
IV	3/2/2018	Wire transfer to Draper's account at Whitefish Credit Union, ending in 8848	\$7,017
V	4/26/2018	Deposit of checks 2658 and 2660, drawn on a Glacier Bank account, into ADI Builders account at Valley Bank of Kalispell, account number ending in 3685	\$8,900
VI	5/14/2018	Deposit of check 6244, drawn on a First Interstate Bank account, into ADI Builders account at Valley Bank of Kalispell, account number ending in 3685	\$5,000
VII	7/19/2018	Deposit of check 1175, drawn on a First Interstate Bank account, into ADI Builders account at Valley Bank of Kalispell, account number ending in 3685	\$6,700
VIII	7/26/2018	Deposit of check 1271, drawn on a Parkside Credit Union account, into ADI Builders	\$1,500

		account at Valley Bank of Kalispell, account number ending in 3685	
IX	9/24/2018	Deposit of check 1046, drawn on an Opportunity Bank account, into Draper's Whitefish Credit Union account, ending in 3786	\$5,500
X	10/24/2018	Deposit of check 2171, drawn on a Glacier Bank account, into Architectural Design and Innovations account at Whitefish Credit Union, account number ending in 3786	\$4,000

## MONEY LAUNDERING – COUNTS XI-XII

### COUNT XI

On or about November 1, 2017, at Kalispell, in the State and District of Montana, the defendant, CRAIG MARK DRAPER, knowingly engaged in a monetary transaction involving property of a value greater than \$10,000, affecting interstate commerce, that is, he transferred \$59,000 from a Whitefish Credit Union account ending in 8848 to an account ending in 0660, such money having been derived from specified unlawful activity, that is wire fraud described in count I, in violation of 18 U.S.C. § 1957.

### COUNT XII

On or about November 16, 2017, at Kalispell, in the State and District of Montana, the defendant, CRAIG MARK DRAPER, knowingly engaged in a monetary transaction involving property of a value greater than \$10,000, affecting interstate commerce, that is, he transferred \$25,884.43 from a Whitefish Credit

Union account ending in 8848 to an account ending in 0660, such money having been derived from specified unlawful activity, that is wire fraud described in count II, and aided and abetted the same, in violation of 18 U.S.C. §§ 1957 and 2.

A TRUE BILL.

Foreperson signature redacted. Original document filed under seal.

  
LEIF M. JOHNSON  
Acting United States Attorney

  
JOSEPH E. THAGGARD  
Criminal Chief Assistant U.S. Attorney

Summons: ☒ IA/Arraigr on 5/24/21 at 10:00 a.m. before KLD  
Warrant: \_\_\_\_\_